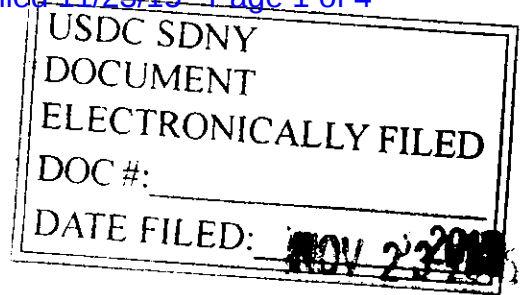


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA :
:
- v. - :
:
TIMOTHY SEDLAK, :
:
Defendant. :
:
- - - - - x



INDICTMENT

15 CRIM 812

COUNT ONE

(Attempt to Commit Computer Hacking)

The Grand Jury charges:

1. From in or about June 2015, up to and including in or about September 2015, in the Southern District of New York and elsewhere, TIMOTHY SEDLAK, the defendant, would and did, and attempted to, intentionally access computers without authorization, and thereby would and did, and attempted to, obtain information from protected computers, for purposes of commercial advantage and private financial gain, and in furtherance of criminal and tortious acts in violation of the Constitution and the laws of the United States, in violation of Title 18, United States Code, Section 1030(a)(2), to wit, SEDLAK made hundreds of thousands of attempts to gain unauthorized access to computers of a specific global charitable organization's network in order to obtain information for his

JUDGE ABRAMS

own commercial advantage and private financial gain.

(Title 18, United States Code, Sections 1030(b), 1030(c)(2)(B).)

FORFEITURE ALLEGATIONS

2. As a result of committing the computer hacking offense alleged in Count One of this Indictment, TIMOTHY SEDLAK, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of the offense.

Substitute Asset Provision

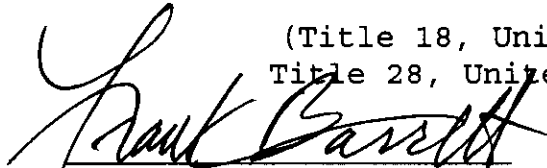
3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

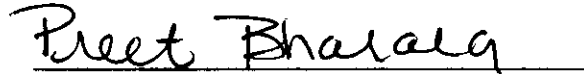
- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), to seek forfeiture of any

other property of the defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Section 982;
Title 28, United States Code, Section 2461.)


FOREPERSON


PREET BHARARA
United States Attorney /pmk

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TIMOTHY SEDLAK,

Defendant.

INDICTMENT

(18 U.S.C. § 1030(b))

PREET BHARARA

For person.

United States Attorney.

Frank Barrett D.F.

11/23/15 - Filed Indictment
ac
Case assigned to J. L. ...
J. Maas
resmg